PLATE PRODUCTS

CREUSABRO 8000® (X-083.1)

SUMMARY

Revision	• We have expanded our explanations, but have not changed any of the specifications.
Use	• Used by OEMs and mines to produce wear part components
Product Characteristics	• Creusabro 8000® carbon/alloy cut-to-length plate is imported under HTS number 7225.40.3050. • Creusabro 8000® carbon/alloy cut-to-length plate developed by Usinor and used primarily by original equipment manufacturers and mines to produce wear part components. It is a cut-to-length plate between 4 and 63 millimeters thick, in widths of 1500-2600 millimeters and lengths of 3000-8300 millimeters, possessing a carbon content of 0.23 to 0.27 percent by weight, a manganese content of 1.00 to 1.50 percent by weight, a chromium content of 0.6 to 1.2 percent by weight, a sulfur content of 0.002 percent by weight and a phosphorous content of 0.015 percent by weight. Additionally, this product provides a tensile strength of 1,400 to 1,700 mpa, guaranteed impact properties of 40 J/cm^2 at – 20 degrees Celsius and a guaranteed hardness of 430 to 500 bhn. The defining characteristic of Creusabro 8000® is the TRIP effect ensuring a strain hardening in service which increases hardness by 70 Brinell.
Total Quantity Imported in 2000	• 3,229 short tons. Usinor is the sole producer of this product.
Is this product produced by U.S. mills?	• No. Other than BSC and USS, no domestic producer objects to the exclusion of this product. BSC and USS, however, are not able to produce this product. Its strain hardening of 70 Brinell when put into service is ensured through transformation induced by plasticity steel ("TRIP"). This TRIP effect results from a combination of the patented chemical analysis and oil quenching heat treatment and is needed to provide superior wear resistance and increase the service life of mining equipment. Such properties cannot be guaranteed or achieved with BSC's 500F and USS's Sheild 450 and 500, which are water quenched steels. The TRIP effect, inherent in Creusabro 8000®, is crucial to guaranteeing a significant improvement in wear resistance (service life) up to 50% over conventional 500 Brinell steels.
Will this product be used in place of other current imports?	• Because of its high price and unique applicability, this product is not competitively substituted for any other product.

Can this product be specifically identified for Customs purposes?	• This product is identifiable for Customs purposes by its trademark and patented chemical analysis.

REVISED EXCLUSION REQUEST

(a) The designation of the product under a recognized standard or certification (e.g., ASTM, DIN), or the commercial name for the product and the HTS number under which this product enters the United States;

Creusabro 8000® carbon/alloy cut-to-length plate is imported under HTS number 7225.40.3050.

(b) A description of the product based on physical characteristics (e.g., chemical composition, metallurgical properties, dimensions, surface quality) so as to distinguish the product from products for which exclusion is not sought;

Creusabro 8000® carbon/alloy cut-to-length plate developed by Usinor and used primarily by original equipment manufacturers and mines to produce wear part components. It is a cut-to-length plate between 4 and 63 millimeters thick, in widths of 1500-2600 millimeters and lengths of 3000-8300 millimeters, possessing a carbon content of 0.23 to 0.27 percent by weight, a manganese content of 1.00 to 1.50 percent by weight, a chromium content of 0.6 to 1.2 percent by weight, a sulfur content of 0.002 percent by weight and a phosphorous content of 0.015 percent by weight. Additionally, this product provides a tensile strength of 1,400 to 1,700 mpa, guaranteed impact properties of 40 J/cm^2 at – 20 degrees Celsius and a guaranteed hardness of 430 to 500 bhn. The defining characteristic of Creusabro 8000® is the TRIP (Transformation Induced by Plasticity) effect which ensures a strain hardening in service which increases hardness by 70 Brinell.

(c) The basis for requesting an exclusion;

Usinor is the sole producer of this product. No domestic producer, including BSC or USS, is able to produce this product. Its strain hardening of 70 Brinell when put into service is ensured through transformation induced by plasticity steel ("TRIP"). This TRIP effect results from a combination of the patented chemical analysis and oil quenching heat treatment and is needed to provide superior wear resistance and increase the service life of mining equipment. All other domestic producers do not object to the exclusion of this product.

(d) The names and locations of any producers, in the United States and foreign countries, of the product;

None.

(e) Total U.S. consumption of the product, if any, by quantity and value for each year, from 1996-2000, and projected annual consumption for each year from 2001-2005, with an explanation of the basis for the projection;

Response contains confidential information. *See* original submission, November 13, 2001.

(f) Total U.S. production of the Product for each year from 1996-2000, if any;

None.

(g) The identity of any U.S. produced substitute for the product, total U.S. production of the substitute for each year from 1996 to 2000, and the names of any U.S. producers of the substitute;

The domestic industry has not identified any U.S-produced substitutes.

(h) Parties supporting this request.

N/A.

(i) Contact Person.

For any questions regarding this request, please contact:

Lisa Raisner
SHEARMAN & STERLING
801 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
Tel: 202-508-8049
Fax: 202-508-8100
E-mail: lraisner@shearman.com

CREUSABRO M™ (X-083.2)

SUMMARY

Revision	• We have expanded our explanations, but have not changed any of the specifications.
Other Requests	• Lyman Steel Company (*See* X-032.2) (carbon content differs slightly: 0.8-0.9)
Use	• Used primarily in the production of electromagnets and magnetic separators, bushings for heavy cranes and shovels, shot blast cabinet liners, and bolster plate components for railway trucks.
Product Characteristics	• Creusabro M™ is imported under HTS number 7225.40.3050. • Creusabro M™ is an alloy cut-to-length plate primarily used in the production of wheel and axle housing components for railway trucks and shot blasting cabinet liners. Creusabro M™ alloy cut-to-length plate is a non-magnetic, fully austenitic structure offering a guaranteed hardness of 180 to 250 bhn and a tensile strength of 800 mpa. Its chemical composition consists of a carbon content of 1.1 to 1.2 percent by weight, a manganese content of 12.0 to 13.5 percent by weight, a maximum sulfur content of 0.010 percent by weight, a maximum phosphorous content of 0.030 percent by weight and a maximum silicon content of 0.010 percent by weight. • Creusabro M™ is quench annealed.
Total Quantity Imported in 2000	• 2,562 short tons • Total imports from all sources was less than 5,500 short tons (only two foreign producers).
Is this product produced by U.S. mills?	• No. BSC and USS stopped production of this grade in 1980. Any material they may have since tolled did not make it to market. • Ellwood Materials Technologies is a forging company and cannot make plate. In 2001, Ellwood declined a request to make this product. (*See* attached.) • All other domestic producers do not object to the exclusion of this product.
Will this product be used in place of other current imports?	• Because of its high price and unique applicability, this product is not competitively substituted for any other product.

Can this product be specifically identified for Customs purposes?	• This product is identifiable for Customs purposes by its trademark, chemical analysis and physical testing (i.e., with a magnet, as it is the only black plate which is not magnetic).

REVISED EXCLUSION REQUEST

(a) The designation of the product under a recognized standard or certification (e.g., ASTM, DIN), or the commercial name for the product and the HTS number under which this product enters the United States;

Creusabro M™ is in accordance with ASTM A 128 Grade B2 and is normally imported under HTS number 7225.40.3050.

(b) A description of the product based on physical characteristics (e.g., chemical composition, metallurgical properties, dimensions, surface quality) so as to distinguish the product from products for which exclusion is not sought;

Creusabro M™ is a carbon/alloy cut-to-length plate primarily used in the production of wheel and axel housing components for railway trucks and shot blasting cabinet liners. Creusabro M™ carbon/alloy cut-to-length plate is a non-magnetic, fully austenitic structure offering a guaranteed hardness of 180 to 250 bhn and a tensile strength of 800 mpa. Its chemical composition consists of a carbon content of 1.1 to 1.2 percent by weight, a manganese content of 12.0 to 13.5 percent by weight, a maximum sulfur content of 0.010 percent by weight, a maximum phosphorous content of 0.030 percent by weight and a maximum silicon content of 0.010 percent by weight. Creusabro M™ is quench annealed. Creusabro M™ is sold in full size ranging from 3/16"-4 3/4" thick in widths between 60" and 120" and lengths of 120" to 288". Creusabro M™ is the only product in 3/16" and 1/4" thicknesses by 60" width which conforms to the AAR (American Association of Railroads) specification with special thickness requirement of ± 0.008".

(c) The basis for requesting an exclusion;

BSC and USS stopped production of this grade in 1980. Any material they may have since tolled did not make it to market. Ellwood Materials Technologies is a forging company and cannot make plate. In 2001, Ellwood declined a request to make this product. (*See* attached.) All other domestic producers do not object to the exclusion of this product.

(d) The names and locations of any producers, in the United States and foreign countries, of the product;

There are no U.S. producers. There is one foreign producer in addition to Usinor (CORUS, which sells exclusively through Lyman Steel).

(e) Total U.S. consumption of the product, if any, by quantity and value for each year, from 1996-2000, and projected annual consumption for each year from 2001-2005, with an explanation of the basis for the projection;

Response contains confidential information. *See* original submission, November 13, 2001.

(f) Total U.S. production of the Product for each year from 1996-2000, if any;

None.

(g) The identity of any U.S. produced substitute for the product, total U.S. production of the substitute for each year from 1996 to 2000, and the names of any U.S. producers of the substitute.

There is no substitute for this product. The domestic industry has not identified any U.S.-produced substitute.

(h) Parties supporting this request.

Stulz-Sickles Steel Company (*see* attached)

Astralloy/IMS (*see* attached)

Ford Steel

Sure Alloy Steel

(i) Contact Person.

For any questions regarding this request, please contact:

Lisa Raisner
SHEARMAN & STERLING
801 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
Tel: 202-508-8049
Fax: 202-508-8100
E-mail: lraisner@shearman.com

EMT

August 3, 2001

Stulz-Sickles Steel Company
929 Julia Street
P.O. Box 273
Elizabeth, NJ 07207

Fax No.: 908-351-8321

Attention: Mr. Philip DeStasio
President

Dear Mr. DeStasio

Subject: Hadfield Manganese Steel Plates

Thank you for your recent inquiry for the supply of Hadfield Manganese Steel Plates. Due to an exclusive supply agreement with another distributor, Ellwood Materials Technologies is not able to quote this material to you at the present time.

Should we become able to supply this material to you in the future, we will contact you. Thank you again for your interest.

Sincerely yours,

ELLWOOD MATERIALS TECHNOLOGIES CO.

John R. Paules

ELLWOOD MATERIALS TECHNOLOGIES COMPANY - P. O. BOX 31, ELLWOOD CITY, PA 16117
PHONE: 724-752-0065 • FAX: 724-752-9711

MANGANAL
SINCE 1916

STULZ-SICKLES STEEL COMPANY

929 JULIA STREET, P.O. BOX 273 • ELIZABETH, NJ 07207 • 1 800 351-1776 FAX 908 351-8231

12% - 14% MANGANESE STEEL BARS PLATE, SHAPES, FABRICATIONS; HARDSURFACING WELDING ELECTRODES

July 10, 2001

7/ 21

Attn: Mr John R Paules – General Manager
Ellwood Materials Technologies Co
PO Box 31
Ellwood PA 16117

FAX NO – 724-658-6855

Re: Hadfield Grade Manganese Steel Plates
1.00/1.25 C, 12.0 – 14.0 MN Water Quenched

Gentlemen:

It has come to our attention that you are producing subject material.

Would you please quote on the following with expected delivery times.

10,000 LBS	1/4" X 96" X 240"	10,000 LBS	1/2" X 96" X 240"
10,000 LBS	3/8" X 96" X 240"	10,000 LBS	1" X 96" X 240"

Your prompt reply would be appreciated.

Very truly yours,

STULZ-SICKLES STEEL CO

Philip DeStasio, President

FAXED

WEAR RESISTANT STEEL FOR HEAVY INDUSTRY

MANGANAL® APPLICATOR BARS AND PLATES

HADFIELD GRADE · 12-14% MANGANESE STEEL · 1.0 / 1.25 CARBON

FLATS						ROUNDS	SQUARES	PLATES
SIZE	SIZE	SIZE	SIZE	SIZE	SIZE	SIZE	SIZE	THICKNESS
3/16" x 2-1/2"	3/8" x 1"	1/2" x 1"	3/4" x 1-1/2"	1" x 1-1/2"	1-1/2" x 2"	3/8" 2-1/4"	3/8"	3/16" 1-1/4"
1/4" x 1"	1-1/2"	1-1/2"	2"	2"	6"	1/2" 2-1/2"	1/2"	1/4" 1-3/8"
1-1/2"	2"	2"	2-1/2"	3"		5/8" 3"	5/8"	5/16" 1-1/2"
2"	2-1/2"	2-1/2"	3"	4"	2" x 3"	3/4" 3-1/2"	3/4"	3/8" 1-5/8"
2-1/2"	3"	3"	3-1/2"	5"	4"	7/8" 4"	1"	1/2" 1-3/4"
3"	4"	3-1/2"	4"	6"	6"	1" 4-1/2"	1-1/4"	5/8" 2"
4"	4-1/2"	4"	5"	8"	8"	1-1/8" 5"	1-1/2"	3/4" 2-1/4"
ANGLES	5"	5"	6"			1-1/4" 5-1/2"	2"	7/8" 2-1/2"
2"x 2"x 1/4"	6"	6"				1-1/2" 6"		1" 3"
PINS & BUSHINGS						1-3/4" 7"		1-1/8"
SHOT-BLAST GRATING						2"		STOCK SIZES: 48" x 96" 48" x 144" 60" x 120" 72" x 144" 84" x 120" 96" x 240" & Lengths up to 24 ft.

IT'S USED HERE... FOR MAINTENANCE AND REPAIR:

QUARRY, MINING, EXCAVATING AND COAL INDUSTRIES

- ROCK CRUSHER JAWS, MANTLES & HAMMERS
- SHOVEL BUCKETS
- STONE CHUTES
- CONVEYOR CHAIN WEARSTRIPS
- ELEVATOR BUCKETS
- QUARRY TRUCK BOTTOMS
- CRUSHER LINERS
- BULLDOZERS AND SCRAPERS
- MUCKERS

FOUNDRIES & STEEL MILLS

- ORE BUCKETS
- SINTERING SEAL BARS
- SHAKE-OUT MACHINES
- SHOT BLAST CABINETS
- SCRAP HANDLING EQUIPMENT

...and many other places where heavy impact, abrasion or metal-to-metal wear is a problem.

IT DOES THIS...

- RESISTS SEVERE IMPACT AND ABRASION
- WORK HARDENS RAPIDLY UP TO 500/550 BRINELL
- RETAINS INNER TOUGHNESS
- HAS VERY LOW FRICTIONAL PROPERTY IN METAL-TO-METAL APPLICATIONS
- WELD WITH STULZ MANGANESE-XL OR SIMILAR ELECTRODE
- CAN BE CUT BY OXYACETYLENE TORCH, PLASMA OR WATER JET
- HAS NON-MAGNETIC PROPERTY

FABRICATED PARTS TO SPECIFICATION

THIS IS WHAT IT IS ...

PHYSICAL PROPERTIES:

Yield Strength ..... 60,000/85,000 psi
Tensile Strength.. 120,000/130,000 psi
% Elongation in 2" 35%/50%
Hardness as Rolled ..... 230/255 bhn
Work Hardens-up to ..... 550 bhn
Non-magnetic

CHEMICAL ANALYSIS:

Mn–12.0/14.0 Si–0.60 Max.
C–1.00/1.25 P–0.05 Max.
S–0.04 Max.

HADFIELD GRADE

WELDED, PUNCHED, DRILLED AND FORMED FABRICATIONS WILL BE QUOTED ON SUBMISSION OF SKETCH OR BLUEPRINT SPECIFICATIONS

MANGANAL

The Wear-Resistant High Manganese Steel

1 WHAT IS MANGANAL? (OUR TRADE NAME)

Manganal is high manganese, austenitic (non-magnetic), work-hardening steel. Typically, its chemical composition is:

Manganese – 12.00/14.00%
Carbon – 1.00/ 1.25%

2 WHAT IS UNUSUAL ABOUT IT?

Manganal thrives on severe wear conditions. The more impact and hammering it receives, the harder the surface becomes. This characteristic, known as work-hardening, plus the fact that it remains ductile underneath, makes it a most effective steel in combating impact and abrasion.

3 HOW AND WHEN DID HIGH MANGANESE STEEL COME INTO BEING?

It was discovered by Robert A. Hadfield in Sheffield, England in 1882, and was first produced in the U.S. in 1892.

4 WHY IS IT WIDELY USED?

It has very high strength, ductility, toughness, and excellent wear resistance in the most punishing applications.

5 IN WHAT FORMS IS IT AVAILABLE TODAY?

It is available under the trade name Manganal as plates, hot-rolled bars and special shapes.

6 WHY IS MANGANAL DIFFERENT FROM CASE-HARDENED STEELS?

With carburized or case-hardened steel, the depth of hardness is fixed. When Manganal is subjected to wear the hard surface continuously renews itself.

STULZ SICKLES

MANGANAL
SINCE 1916

STULZ-SICKLES STEEL COMPANY

929 JULIA STREET, P.O. BOX 273 • ELIZABETH, NJ 07207 • 1 800 351-1776 FAX 908 351-8231

12% - 14% MANGANESE STEEL BARS, PLATE, SHAPES, FABRICATIONS; HARDSURFACING WELDING ELECTRODES

November 12, 2001

COUNTY OF UNION)
)
STATE OF NEW JERSEY)

I, PHILIP DESTASIO, PRESIDENT OF STULZ SICKLES STEEL CO. DO HEREBY SWEAR AND ATTEST TO THE FOLLOWING IN SUPPORT OF EXCLUDING HADFIELD GRADE MANGANESE STEEL (USINOR INDUSTEEL CREUSABRO M-ASTM A 128 GRADE B2) FROM THE SCOPE OF ANY REMEDIES IMPOSED IN THE 201 INVESTIGATION.

STULZ SICKLES IS A STEEL WAREHOUSE THAT HAS BEEN IN BUSINESS SINCE 1916 AND WHOSE SALES ARE OVER 50% IN THE HADFIELD GRADE LINES OF MANGANESE, EITHER IN FABRICATIONS OR SALE OF PLATE AND BARS.

I HAVE BEEN WITH THIS COMPANY OVER 35 YEARS AND FOR ABOUT THE FIRST TEN YEARS WE PURCHASED ALL OUR MANGANESE STEEL FROM BETHLEHEM AND US STEEL CO. ONE DAY WE WERE NOTIFIED THAT NEITHER COMPANY WAS GOING TO PRODUCE HADFIELD GRADE STEEL OR ANY HIGH GRADE OF MANGANESE STEEL. THIS WAS GOING TO FORCE US OUT OF OUR MARKET PLACE SO WE SOUGHT AND FOUND COMPANIES IN OTHER COUNTRIES TO MAKE OUR PRODUCTS AND KEEP US IN BUSINESS.

THE DECISION NOT TO PRODUCE HADFIELD GRADE MANGANESE STEEL WAS NOT MINE, BUT RATHER OFFICIALS OF OUR DOMESTIC MILLS. I RECALL TELLING ONE OF THESE GENTLEMEN TO RAISE PRICES, BUT WAS TOLD THAT HIGHER UPS HAD DECIDED TO DROP THE HIGH MANGANESE LINE.

IF THIS PRODUCT IS PUT ON RESTRICTION IT WOULD HAVE A DRASTIC AFFECT ON OUR COMPANY AND WOULD CAUSE EITHER A DRASTIC REDUCTION IN OUR PERSONNEL OR AN OUTRIGHT CLOSURE.

AT PRESENT IT TAKES ABOUT SIX MONTHS FROM THE TIME WE ORDER UNTIL THE TIME MATERIAL IS RECEIVED BY US. I CANNOT SEE HOW COMPANIES THAT DID NOT WANT TO MAKE HADFIELD GRADE STEEL FOR SO MANY YEARS, WOULD NOW THINK IT A FEASIBLE VENTURE. I AM QUITE SURE IT WOULD TAKE MORE THAN A YEAR TO REVAMP WHAT THEY PRESENTLY DO IN ORDER TO MAKE HADFIELD GRADE STEEL WHICH WOULD EXTEND MY DELIVERIES EVEN MORE.

I HEREBY RESPECTFULLY REQUEST THAT HADFIELD GRADE STEEL(ASTM A 128 GRADE B2 REFERRED TO AS CREUSABRO M PRODUCED BY USINOR INDUSTEEL WITH CHEMICAL COMPOSITION OF 1.1/1.25 C, 12.0/14.0 MN) BE EXEMPTED FROM THE SCOPE OF ANY 201 REMEDIES IN THIS PROCEEDING.

PHILIP DESTASIO

County of Jefferson

State of Alabama

1. I, Larry N. Norred, Jr., General Manager & COO of Astralloy Steel Products, Inc. / IMS, do hereby swear and attest to the following is support of excluding: Astralloy-V, EB-450 and Manganese Plate Grades from the scope of any remedies imposed in the Section 201 investigation of certain steel products, Inv. No, TA-201-73.

2. Astralloy Steel Products, Inc. / IMS is a specialty Service Center distribting steel products for the Mining, Aggregates, Cement, Steel, Military, Pulp & Paper, Power Generation industries.

3. Astralloy Steel Products, Inc./ IMS purchase the following products from Mill Supplier, Usinor Industeel (Le Creusot, France & Charleroi, Belguim):

A. Astralloy-V: A proprietary grade of Plate which Usinor Industeel has been producing for over 20 years. There are few mils in the world who posses the combination of capability, experience and knowledge to produce Astralloy-V. Astralloy-V is an extremely difficult grade to successfully produce.
B. EB-450: A proprietary grade of Plate which Usinor Industeel has been producing for nearly 20 years. There are few mils in the world who posses the combination of capability, experience and knowledge to produce EB-450.
C. Managanese: To my knowledge, there ar eno domestic (U.S.) mills which currently produce Manganese plate (11-14% MN).

4. Without exemption of these listed grades of alloy and specialty steel plates Astralloy Steel Products, Inc. / IMS supply would be severely restricted and the impact on our business would be significant and detrimental.

5. In sum, it is evident that the long-term costs imposed on Astralloy Steel Products, Inc. / IMS and similarly situated companies, as a result of trade restrictions on : Astralloy-V, EB-450 and Manganese plate, would greatly outweigh the temporary benefits conferred upon the domestic industry. I hereby respectfully request that : Astralloy-V, EB-450 and Manganese plate be exempted from the scope of any Section 201 remedies in this proceeding.

Larry N. Norred, Jr.
General Manager & COO

Subscribed and sworn to before me this 12th day of November, 2001.

ASTRALLOY V®™ (X-083.3)

SUMMARY

Revision	• We have expanded our explanations, but have not changed any of the specifications.
Use	• Primarily used in mining equipment and civil ballistic production applications
Product Characteristics	• Astralloy V®™ is imported under HTS number 7225.40.3050. • Astralloy V®™ cut-to-length plate from 3 millimeters to 6 millimeters in thickness that provides increased wear resistance and is primarily used in mining production, but is also suitable for some applications in civil ballistic production. It is produced by authorization and for the exclusive needs of Astralloy/IMS (USA). Its chemical composition is 0.24 carbon, 0.925 manganese, 3.5 nickel, 1.5 chromium, 0.3 molybdenum.
Total Quantity Imported in 2000	• 1,443 short tons. Usinor is the sole producer of this product in these thicknesses.
Is this product produced by U.S. mills?	• Bethlehem Lukens can produce a similar product, but not in the above-listed thicknesses. • Astralloy has been unable to purchase this product from either BSC or USS. No other U.S. producer objects to the exclusion of this product.
Will this product be used in place of other current imports?	• Because of its high price and unique applicability, this product is not competitively substituted for any other product.
Can this product be specifically identified for Customs purposes?	• This product is identifiable for Customs purposes by its trademark and chemical analysis.

REVISED EXCLUSION REQUEST

(a) The designation of the product under a recognized standard or certification (e.g., ASTM, DIN), or the commercial name for the product and the HTS number under which this product enters the United States;

Astralloy V®™ is imported under HTS number 7225.40.3050.

(b) A description of the product based on physical characteristics (e.g., chemical composition, metallurgical properties, dimensions, surface quality) so as to distinguish the product from products for which exclusion is not sought;

Astralloy V®™ cut-to-length plate from 3 millimeters to 6 millimeters in thickness that provides increased wear resistance and is primarily used in mining production, but is also suitable for some applications in civil ballistic production. It is produced by authorization and for the exclusive needs of Astralloy/IMS (USA). Its chemical composition is 0.24 carbon, 0.925 manganese, 3.5 nickel, 1.5 chromium, 0.3 molybendum.

(c) The basis for requesting an exclusion;

Usinor is the sole producer of Astralloy V®™ carbon/alloy cut-to-length plate in thicknesses ranging from 3 to 6 millimeters. Bethlehem Lukens can produce a similar product, but not in the above-listed thicknesses. Astralloy has been unable to purchase this product from either BSC or USS. No other U.S. producer objects to the exclusion of this product.

(d) The names and locations of any producers, in the United States and foreign countries, of the product;

There is no U.S. production in this product in the above-mentioned thicknesses. Information on other foreign producers is not available.

(e) Total U.S. consumption of the product, if any, by quantity and value for each year, from 1996-2000, and projected annual consumption for each year from 2001-2005, with an explanation of the basis for the projection;

Response contains confidential information. *See* original submission, November 13, 2001.

(f) Total U.S. production of the Product for each year from 1996-2000, if any;

None.

(g) The identity of any U.S. produced substitute for the product, total U.S. production of the substitute for each year from 1996 to 2000, and the names of any U.S. producers of the substitute.

There are no direct substitutes for this proprietary and trademarked product. The domestic industry has not identified a U.S.-produced substitute.

(h) Parties supporting this request.

See attached.

(i) Contact Person.

For any questions regarding this request, please contact:

Lisa Raisner
SHEARMAN & STERLING
801 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
Tel: 202-508-8049
Fax: 202-508-8100
E-mail: lraisner@shearman.com

County of Jefferson

State of Alabama

1. I, Larry N. Norred, Jr., General Manager & COO of Astralloy Steel Products, Inc. / IMS, do hereby swear and attest to the following is support of excluding: Astralloy-V, EB-450 and Manganese Plate Grades from the scope of any remedies imposed in the Section 201 investigation of certain steel products, Inv. No, TA-201-73.

2. Astralloy Steel Products, Inc. / IMS is a specialty Service Center distribting steel products for the Mining, Aggregates, Cement, Steel, Military, Pulp & Paper, Power Generation industries.

3. Astralloy Steel Products, Inc./ IMS purchase the following products from Mill Supplier, Usinor Industeel (Le Creusot, France & Charleroi, Belguim):

A. Astralloy-V: A proprietary grade of Plate which Usinor Industeel has been producing for over 20 years. There are few mils in the world who posses the combination of capability, experience and knowledge to produce Astralloy-V. Astralloy-V is an extremely difficult grade to successfully produce.
B. EB-450: A proprietary grade of Plate which Usinor Industeel has been producing for nearly 20 years. There are few mils in the world who posses the combination of capability, experience and knowledge to produce EB-450.
C. Managanese: To my knowledge, there ar eno domestic (U.S.) mills which currently produce Manganese plate (11-14% MN).

4. Without exemption of these listed grades of alloy and specialty steel plates Astralloy Steel Products, Inc. / IMS supply would be severely restricted and the impact on our business would be significant and detrimental.

5. In sum, it is evident that the long-term costs imposed on Astralloy Steel Products, Inc. / IMS and similarly situated companies, as a result of trade restrictions on : Astralloy-V, EB-450 and Manganese plate, would greatly outweigh the temporary benefits conferred upon the domestic industry. I hereby respectfully request that : Astralloy-V, EB-450 and Manganese plate be exempted from the scope of any Section 201 remedies in this proceeding.

Larry N. Norred, Jr.
General Manager & COO

Subscribed and sworn to before me this 12th day of November, 2001.

NINE-PERCENT NICKEL ALLOY STEEL PLATE PRODUCED TO EUROPEAN STANDARDS (X-083.4)

SUMMARY

<table>
<tr><td>Revision</td><td>• In our initial request we emphasized that no U.S. mills produced nine-percent nickel alloy steel in conformity with the European standards and codes. Usinor's customer for this product requires European standards because they export their product to the European market. In the revised version of the request, we have more clearly specified the European standards.</td></tr>
<tr><td>Use</td><td>• Used in the manufacture of pressure vessels and storage tanks for cryogenic products</td></tr>
<tr><td>Product Characteristics</td><td>• Nine-percent nickel alloy steel plate is imported under HTS numbers 7224.40.3050 and 7224.40.3020.

• Nine-percent nickel steel plate grades ASTM/ASME A 353 (as rolled) and A553 (quenched and tempered) with thicknesses of 0.1875" and greater, with extremely high strength characteristics including high-impact values at –196 degrees Celsius, minimal longitudinal requirements of 90J, and transverse charpy impact energy requirements of 80J, and manufactured in compliance with the European material standard EN 10028-Part 4 and the required certification EN 10204 3.1.A.

• Nine-percent nickel alloy steel plate possesses the following chemical composition: (percentages are by weight)
<table>
<tr><th>Carbon</th><th>Manganese</th><th>Phosphorous</th><th>Sulfur</th><th>Silicon</th><th>Nickel</th></tr>
<tr><td>0.13% max</td><td>0.90%-0.98% max</td><td>0.015% max</td><td>0.010% max.</td><td>0.13%-0.45%</td><td>8.40%-9.60%</td></tr>
</table>
</td></tr>
<tr><td>Total Quantity Imported in 2000</td><td>• 5,260 short tons imported from Usinor.</td></tr>
</table>

Is this product produced by U.S. mills?	• No. While BSC does make nine-percent nickel alloy steel plate in some widths and thicknesses, it is not currently able to manufacture this product in accordance with the European material standard EN 10028-Part 4 and the required certification EN 10204 3.1.A, which is essential for some international applications of the material. Without this certification, customers cannot export their finished product to all of the European market. BSC does have a less-stringent European certification, but this is not sufficient for material used in pressure vessels and cryogenic storage tanks to be sold in all European countries. • All other domestic producers do not object to the exclusion of this product.
Will this product be used in place of other current imports?	• Because of its high price and unique applicability, this product is not competitively substituted for any other product.
Can this product be specifically identified for Customs purposes?	• This product is identifiable for Customs purposes by its ASTM/ASME grade.

REVISED EXCLUSION REQUEST

(a) The designation of the product under a recognized standard or certification (e.g., ASTM, DIN), or the commercial name for the product and the HTS number under which this product enters the United States;

Nine-percent nickel alloy steel plate is imported under HTS numbers 7224.40.3050 and 7224.40.3020

(b) A description of the product based on physical characteristics (e.g., chemical composition, metallurgical properties, dimensions, surface quality) so as to distinguish the product from products for which exclusion is not sought;.

Nine-percent nickel steel plate grades ASTM/ASME A 353 (as rolled) and A553 (quenched and tempered) with thicknesses of 0.1875" and greater, with extremely high strength characteristics including high-impact values at –196 degrees Celsius, minimal longitudinal requirements of 90J, and transverse charpy impact energy requirements of 80J, and manufactured in compliance with the European material standard EN 10028-Part 4 and the required certification EN 10204 3.1.A.

Nine-percent nickel alloy steel plate possesses the following chemical composition: (percentages are by weight)

Carbon	Manganese	Phosphorous	Sulfur	Silicon	Nickel
0.13% max.	0.90%-0.98% max.	0.015% max.	0.01% max.	0.13%-0.45%	8.40%-9.60%

(c) The basis for requesting an exclusion;

While BSC does make nine-percent nickel alloy steel plate in some widths and thicknesses, it is not currently able to manufacture this product in accordance with the European material standard EN 10028-Part 4 and the required certification EN 10204 3.1.A, which is essential for some international applications of the material. Without this certification, customers cannot export their finished product to all of the European market. BSC does have a less-stringent European certification, but this is not sufficient for material used in pressure vessels and cryogenic storage tanks to be sold in all countries. All other domestic producers do not object to the exclusion of this product.

(d) The names and locations of any producers, in the United States and foreign countries, of the product;

None to the EN10204 3.1.A standard.

(e) **Total U.S. consumption of the product, if any, by quantity and value for each year, from 1996-2000, and projected annual consumption for each year from 2001-2005, with an explanation of the basis for the projection;**

Response contains confidential information. *See* original submission, November 13, 2001.

(f) **Total U.S. production of the Product for each year from 1996-2000, if any;**

None.

(g) **The identity of any U.S. produced substitute for the product, total U.S. production of the substitute for each year from 1996 to 2000, and the names of any U.S. producers of the substitute.**

Usinor is not aware of any substitute for the above-mentioned nine-percent nickel alloy steel. The domestic industry has not identified any U.S.-produced substitute.

(h) **Parties supporting this request.**

Chart Industries, Inc. (*see* attached)

(i) **Contact Person.**

For any questions regarding this request, please contact:

Lisa Raisner
SHEARMAN & STERLING
801 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
Tel: 202-508-8049
Fax: 202-508-8100
E-mail: lraisner@shearman.com

Storage Systems Division
Chart Industries, Inc.

3505 County Road 42 West
Burnsville, MN 55306-3803 USA
Tel: 612 882 5000 Fax: 612.882 5191

Affidavit Filer Profile:
My name is Joe Minnick and I am a Strategic Sourcing Manager for Chart Industries, Inc. I am writing to request that the Commission exclude 9% (SA 553 and SA 353) alloy steel plate from the scope of this section 201 investigation. I have been employed by Chart for 10 ½ years and have been working in the Metal Fabrication/Steel Industry for 28 years plus.

Company Profile:
Chart is a manufacturer of storage tanks and other cryogenic products for use in biomedical, electronics, chemical, metallurgical and many other applications. Chart is the world's largest producer of the cryogenic storage systems, with customer's worldwide and employing 2410 employees in 14 states and around the world.
Chart's manufactures its cryogenic systems using 9% nickel alloy plate in specified widths depending on the size of the storage system being manufactured. Tank heads – these are the ends of the tanks – are manufactured from SA 353 grade (ASME Code) 9% nickel alloy plate. Tanks Shells – the wall of the tank – are manufactured using SA 553 grade (ASME Code), 9% nickel alloy plate.
Chart's cryogenic tanks are used to store industrial gases, under pressure in liquid form. ASME (U.S.A) and PED (European Union) pressure vessel codes control the inner vessel design.

Injury to Chart
If the commission restricts imports or applies additional duties on 9% nickel alloy steel plate, this would have a tremendous negative impact on Chart Industries, Inc. business for these reasons:

(1) No domestic producer manufactures 9% nickel plate alloy steel plate in all the widths and thickness that Chart requires to manufacture the cryogenic systems in sizes that Chart's customer's demand. Using only the limited sizes of plate offered by the single U.S. producer, would require substantially increased Engineering, Quality Control, Manufacturing costs related to design changes in addition to increased material cost.
(2) Furthermore, no domestic producer manufactures 9% nickel alloy steel plate that conforms to European standards and codes. In order to export product into Europe, Asia and SA, conformity of the raw material to European standards is a mandatory requirement.
(3) Restricting Chart's source of supply will increase Chart's cost, make us non-competitive and allow increased competition from Chart's foreign competitors selling completed assemblies using foreign material and labor.

Summary
Chart currently purchased 9% nickel alloy steel plate from both Usinor Industeel in Belgium and Bethlehem/Lukens in the United States. In the event that Chart can only obtain 9% nickel alloy plate from a domestic supplier, Chart will be forced to make dramatic adjustment to its operations, possibly resulting in the relocation of production to available facilities in the Czech Republic or other foreign operations.

On behalf of Chart Industries, Inc. and its employees, I thank the Commission for its consideration of the important issue. Please do not hesitate to contact me if you have any questions.

Section 201 Discussion

Chart Overview

- World's leading supplier of cryogenic equipment and substantial exporter of fabricated steel products
- 2000 revenue: $325MM
- Over 90% of manufacturing is done in the United States
- Over 85% of steel purchased is produced in the United States

Domestic Steel Production Insufficient

- Chart's largest product line is cryogenic bulk storage tanks, which are used to store cryogenic liquids for many industrial applications.

- The critical pressure vessel component of these cryogenic storage tanks is made in the United States from 9% nickel alloy plate.

- There is only one domestic producer of 9% nickel alloy plate.
  - This producer is not an established supplier of the range of widths, thicknesses and quality standards Chart requires.
  - Forced dependence on the single domestic supplier puts our entire business at risk.

- Because of its high price and unique cryogenics applicability, 9% nickel is not competitively substituted for any other plate.

- Charts imports of 9% nickel alloy plate total only $3.5 million.

Impact of Section 201 Tariff on 9% Nickel Alloy Plate

- Additional tariffs on imports would make the cost of manufacturing with 9% nickel alloy plate prohibitive.

- Our customers are large, global, industrial companies with global supply alternatives. Chart would become disadvantaged to competitors from Mexico, Brazil, France, Korea, and China.

- Chart and other U.S. cryogenic producers would be forced to shift production from the United States to factories in Czech Republic, China, Slovakia, and Malaysia.
  - This happened once before when the price of stainless steel plate, also used in building these products, became too high and this production was moved offshore at a cost of over 320 U.S. jobs.

- Losses to the U.S. economy would include:
  - **$50MM** of value-added manufacturing
  - **450 jobs** *(2x if other domestic manufacturers also move off-shore)*
  - **Steel industry jobs**, from the $14MM in 9% nickel plate and other steel products that Chart currently sources domestically.
  - Chart **supplier jobs**
  - **Additional Indirect jobs** in the Minnesota, New Hampshire, and Massachusetts economies where Chart is a significant driver of the local economy

CLAD PLATE (X-083.5)

SUMMARY

Revision	• We have expanded the explanation of our specifications.
Use	• Used for pollution control, oil and gas, piping and various industrial pressure vessel applications
Product Characteristics	• Clad Plate is imported under HTS numbers 7210.90.1000 and 7225.99.0090. • Clad plate has a carbon or low-alloy steel base that is bonded to stainless steel or nickel-based alloy cladding and is limited to applications that require durable corrosion-resistant properties and resistance to extremely harsh physical conditions (such as heat and pressure). • *See* attached specifications
Total Quantity Imported in 2000	• 40 short tons (and 300 short tons in 2001)
Is this product produced by U.S. mills?	• Bethlehem cannot meet the stringent specifications for the applications listed above. (*See* attached.) • While claiming to make this product in its comment on this request, Bethlehem declined a January 2002 order for this product, stating that the "combination of quantity, materials, requirements, dimensions, etc. do not lead themselves to our present production methods or facility." (*See* attached.) • All other U.S. producers do not object to the exclusion of this product.
Will this product be used in place of other current imports?	• Because of its high price and unique applicability, this product is not competitively substituted for any other product.
Can this product be specifically identified for Customs purposes?	• This product is identifiable for Customs purposes by ASTM grade and chemical analysis.

REVISED EXCLUSION REQUEST

(a) The designation of the product under a recognized standard or certification (e.g., ASTM, DIN), or the commercial name for the product and the HTS number under which this product enters the United States;

Clad Plate is imported under HTS numbers 7210.90.1000 and 7225.99.0090.

(b) A description of the product based on physical characteristics (e.g., chemical composition, metallurgical properties, dimensions, surface quality) so as to distinguish the product from products for which exclusion is not sought;

Clad plate has a carbon or low-alloy steel base that is bonded to stainless steel or nickel-based alloy cladding and is limited to applications that require durable corrosion-resistant properties and resistance to extremely harsh physical conditions (such as heat and pressure).

(c) The basis for requesting an exclusion;

Bethlehem cannot meet the stringent specifications for the applications listed above. (*See* attached.)

While claiming to make this product in its comment on this request, Bethlehem declined a January 2002 order for this product, stating that the "combination of quantity, materials, requirements, dimensions, etc. do not lead themselves to our present production methods or facility." (*See* attached.)

All other U.S. producers do not object to the exclusion of this product.

(d) The names and locations of any producers, in the United States and foreign countries, of the product;

There are no U.S. producers of this product. There are foreign producers in Germany and Japan.

(e) Total U.S. consumption of the product, if any, by quantity and value for each year, from 1996-2000, and projected annual consumption for each year from 2001-2005, with an explanation of the basis for the projection;

Response contains confidential information. *See* original submission, November 13, 2001.

(f) Total U.S. production of the Product for each year from 1996-2000, if any;

None.

(g) The identity of any U.S. produced substitute for the product, total U.S. production of the substitute for each year from 1996 to 2000, and the names of any U.S. producers of the substitute.

There is no substitute for this product. The domestic industry has not identified a U.S.-produced substitute.

(h) Parties supporting this request.

KLAD LLP

PSP Industries

Polymetallurgical Corp.

Congressman Gene Green

(i) Contact Person.

For any questions regarding this request, please contact:

Lisa Raisner
SHEARMAN & STERLING
801 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
Tel: 202-508-8049
Fax: 202-508-8100
E-mail: lraisner@shearman.com

fax: (713) 433 – 5545

to: KLAD LLP

attn.: Robert Jenkerson

ref.: RFQ KLAD® Plate Inquiry

We have received the referenced inquiry. After careful analysis and additional evaluation, the facts dictate the following conclusion. This combination of; quantity, material(s), requirement(s), dimension(s) etc. do not lead themselves to our present production method or facility.

Therefore, we decline your offer to provide a proposal for this particular bill of material. Your understanding of our position is appreciated.

BLP regrets our inability to be of service to you on this specific request. As always, we value the opportunity to review your requirement(s) for Hot Roll Bond Clad Plate.

BETHLEHEM LUKENS PLATE
Armentrout, Edw. R.
Clad Plate

KLAD LLP
14814 Park Almeda
Houston, Texas 77047

Telecopier Cover Letter

Date: January 11, 2002
Of Pages: 1

TO:	Jim Fuga Bethlehem Steel	FROM:	Robert Jenkerson KLAD L.L.P. (713) 433-5544 Phone (713) 433-5545 FAX

Re: KLAD® Plate Inquiry

Item Number	1	ALTERNATE
ASME/ASTM Spec	A265	A265
No. Of Pieces	38	38
Carbon Steel Spec.	API 5L	API 5L
Carbon Steel Grade	X65	X65
CS Thickness	.562"(-0/+1.5mm)	.562"(-0/+1.5mm)
Alloy Spec.	SB 424	SB 443
Alloy Grade	825	625
Alloy Min. Thickness	.110" min.	.110" min.
Width Each Plate	105	105
Length Each Plate	242	242

Other Requirements:

1. CMTR's with full chemistry of CS and clad, full mechanical tests, bend tests with clad in tension and compression.
2. ASTM A265 with Shear Test meeting minimum of 35 Ksi value.
3. 100% Ultrasonically tested per SA 578, Acceptance Level C, with S7, S1.
4. G48 Practice A@ 50°C with 4g/ msq max

Thank you,
Robert

November 2, 2001

RE: U. S. International Trade Commission Section 201 Case

To Whom It May Concern:

KLAD LLP is a US manufacturer of clad piping systems. We produce clad pipe and piping components for the oil and gas, refining and nuclear industries. These industries purchase these particular materials for their superior corrosion resistance and high strength levels. KLAD LLP purchases roll bond clad plate to manufacture the pipe and piping components. Specifically, we purchase roll bond clad plate from Usinor Industeel in France for use in international oil and gas projects. US domestic mills cannot produce these products.

Usinor Industeel has some unique capabilities that allow us to procure materials that meet specifications and grades that our customers require. Currently, there is only one US producer of roll bond clad plate, however, they do not have the capabilities to produce the grades and specifications that are required. KLAD LLP's access to the materials meeting international specifications is critical to our business and growth as a company.

We compete successfully in a worldwide market for oil and gas piping projects. Our two chief competitors are located in Japan and Germany. Many of our customers are US based companies. We need to be able to purchase clad materials from Usinor Industeel without tariffs and restrictions. If not, it is likely KLAD LLP will be in a position not being able to procure these starting materials and would be unable to secure orders for clad oil and gas piping projects that represents nearly 70% of our business. Our competitors in Germany or Japan would have the orders, thus eliminating jobs from our shop in Houston, Texas and jeopardizing the health of KLAD LLP.

Thank you for your consideration in this matter.

Yours very truly,

Dr. Bhaven Chakravarti
President

Robert Jenkerson
Vice President Sales & Marketing

KLAD L.L.P. • 14814 Park Almeda • Houston, Texas 77047 • 713-433-5544 • Fax: 713-433-5545
http://www.clad.com

GENE GREEN
25TH DISTRICT, TEXAS

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SUITE 29
HOUSTON, TEXAS 77060
(281) 999-9879

11411 I-10 EAST
SUITE 430
HOUSTON, TEXAS 77029
(713) 330-0781

WWW.HOUSE.GOV/GREEN

Congress of the United States
House of Representatives
Washington, DC 20515-4329

COMMITTEE ON ENERGY AND COMMERCE
- SUBCOMMITTEE ON TELECOMMUNICATIONS AND THE INTERNET
- SUBCOMMITTEE ON HEALTH
- SUBCOMMITTEE ON ENVIRONMENT AND HAZARDOUS MATERIALS

DEMOCRATIC DEPUTY WHIP

DEMOCRATIC STEERING COMMITTEE

November 16, 2001

Mr. Robert Jenkerson
Vice President-- Sales & Marketing
14814 Park Almeda
Houston, Texas 77047-7006

Dear Mr. Jenkerson:

Thank you for your letter regarding the ongoing process at the U.S. Department of Commerce to determine the proper level of redress for our domestic steel industry. I appreciate hearing your views on this issue.

I share your concern that the recent International Trade Commission (ITC) determination under Section 201 of the Trade Act must be considered carefully. Although I support the imposition of significant tariffs against those foreign producers dumping steel in our market, I also understand that we cannot paint every foreign producer with the same brush. Your product line is clearly dependent on access to low-cost speciality steel that can be procured only overseas because there is not a domestic production market. The ITC needs to take that into account.

I have had several conversations with the U.S. Department of Commerce and they seem to understand that tariff sanctions need to be targeted to penalize only those that have so damaged our domestic industry. I am hopeful that, in the coming months, Commerce Secretary Donald Evans will make his determination and restore some balance to our steel industry. Please be assured that, should this issue move to the Congress, I will certainly keep your views in mind.

Thank you again for contacting my office. If I can be of any further assistance on this or any other issue, please do not hesitate to contact me.

Sincerely,

Gene Green
Member of Congress

GG:pdw

PSP INDUSTRIES
TEXAS

PHONE: (210) 651-9595
TELECOPIER: (210) 651-5314
9885 DOERR LANE • SCHERTZ, TEXAS 78154

11/12/01

To Whom It May Concern:

My name is Ron Stirm and I am the Vice President for PSP Industries. I am writing to request that clad plate be excluded from any restrictive remedy imposed on carbon and alloy flat products. I have been employed at PSP for 25 years and have been involved in the Metal Fabrication Business for 27 years.

My company manufactures absorbers and SCR units for the Electrical Power market for pollution control. The roll bonded clad purchased is utilized in the fabrication of absorbers and chimneys worldwide. We have an office and plant located in San Antonio, Texas and one in Iuka, Mississippi with a total of over 380 employees.

The restriction of roll bonded clad from companies like Usinor would have a tremendously negative impact on our business. This would be due to the restricted availability of the product utilized in the fabrication of electrical power and pollution control equipment. There is currently only one domestic supplier of roll bonded clad in North America with limited product and size capabilities to serve the USA power generation needs. Most designs of power related products require wide plate with a small thickness. Usinor has the ability to roll the wider plates required in these designs (over 120").

Most products are specified by US design firms, working directly with the power industry, with a global view of manufacturing and supply. If PSP's access to imported clad plate is restricted by any remedy imposed on carbon and alloy as a result of this Section 201 investigation, PSP's business would suffer a tremendously negative impact. Many of PSP's competitors are overseas and we would likely lose orders to these competitors who have unrestricted access to the clad plate that is necessary to fabricate our products. We shipped two projects recently, one to Athens, Greece and one to Mai-Moe Thailand. Furthermore, if U.S. fabricators are unable to compete as a result of the inability to obtain the necessary clad plate, the U.S. clad plate market as a whole will be very adversely affected. In addition, the clad plate is not in any way interchangeable with the hot bands or other carbon plate that has also been included in the carbon and alloy plate product group.

On behalf of USA fabricators purchasing roll bonded clad and our employees, we ask for your consideration on this unique product.

Sincerely,

Ron Stirm
Vice President
PSP Industries

PSP INDUSTRIES
TEXAS

PHONE: (210) 651-9595
TELECOPIER: (210) 651-5314
9885 DOERR LANE • SCHERTZ, TEXAS 78154

11/6/01

To Whom It May Concern:

My name is Ron Stirm and I am the Vice President for PSP Industries. I am writing to request exclusion for clad plate under the current Section 201 carbon and alloy section. I have been employed at PSP for 25 years and have been involved in the Metal Fabrication Business for 27 years.

My company manufactures absorbers and SCR units for the Electrical Power market for pollution control. The roll bonded clad purchased is utilized in the fabrication of absorbers and chimneys worldwide. We have an office and plant located in San Antonio, Texas and one in Iuka, Mississippi with a total of over 380 employees.

The restriction of roll bonded clad from companies like Usinor would have a tremendously negative impact on our business. This would be due to the restricted availability of the product utilized in the fabrication of electrical power and pollution control equipment. There is currently only one domestic supplier of roll bonded clad in North America with limited product and size capabilities to serve the USA power generation needs. Most products are specified by US design firms, working directly with the power industry, with a global view of manufacturing and supply. Thus, this restriction to availability of international roll bonded clad would cause lost business for USA fabricators as components would be sourced outside the USA with international fabricators who have access to these materials. In addition, a specialized product like clad is in no way similar to the hot bands or carbon plate in the section 201 category. Clad should be more accurately listed under the stainless plate section.

On behalf of USA fabricators purchasing roll bonded clad and our employees, we ask for your consideration on this unique product.

Sincerely,

Ron Stirm
Vice President
PSP Industries

POLYMETALLURGICAL CORP.
A Cookson Company

ISO 9002 ✔ CLAD METALS • BONDING WIRE • PALMET • CORELAY®
262 Broad Street, P.O. Box 3249, North Attleboro, MA 02761 USA
Telephone: (508) 695-9312 e-mail: info@polymet.com
Fax: (508) 695-7512 Web: www.polymet.com

County of Bristol)
) S.S.
Commonwealth of Massachusetts)

1. I, ARMENAG ISKENDERIAN, President of Polymetallurgical Corp., do hereby swear and attest to the following in support of excluding thermostat component alloys such as Invar (T36) and NC4 (T22) produced in accordance with our specifications and ASTM B753 from the scope of any remedies imposed in the Section 201 investigation of certain steel products, Inv. No, TA-201-73.

2. Polymetallurgical Corp. ("PMC") is a manufacturing company operating since 1970 in the Commonwealth of Massachusetts and is engaged in the bonding and processing of specialty clad metals. Clad Metals are composed of dissimilar metals metallurgically bonded together in order to achieve properties not available in single metals. Typical uses of clad metals are thermal and electrical controls, thermal compensators in television tubes, circuit breakers, relays and thermal switches, various electronic and semiconductor components. PMC uses a proprietary continuous hot bonding technique to manufacture its products and is the only company in the USA capable of producing finished thermostat metals at thicknesses above 0.110". This capability partially depends on its ability to procure raw materials, such as T36 and T22, to its exacting specifications, as mentioned in Para. 1.

3. PMC is forced to import thermostat component alloys for its products used in thermal controls and thermal compensator products used in television tubes. For, these products are required at heavy gauges (typically from .100" to .118"). PMC's specifications are very stringent and the raw materials available in the domestic market cannot meet our requirements. Additionally, there is only one domestic manufacturer of these alloys, which has not been able to obtain the necessary qualifications to produce these products.

4. The business impact caused by the restriction, elimination, or significant price increase of these products on PMC would be devastating. Approximately forty-eight percent of PMC's sales are derived from the sale of heavy-gauge thermostat metals produced for a major television manufacturer in USA and are exported to the same customer's plants in the Far East. Any cost increase would further exasperate a highly competitive market environment we are in, and it would unquestionably cause PMC to be forced out of the market. PMC's Far East competition would simply replace our lost market, causing PMC to lose 48% of its sales and a corresponding number of jobs would be permanently lost.

5. In sum, it is evident that the long-term costs imposed on PMC and similarly situated companies, as a result of trade restrictions on thermostat component alloys, such as Invar (T36) and NC4 (T22), would greatly outweigh the temporary benefits conferred upon the domestic industry. I hereby respectfully request that thermostat component alloys, such as Invar (T36) and NC4 (T22) be exempted from the scope of any Section 201 remedies in this proceeding.

Armenag Iskenderian
President
Polymetallurgical Corp.

Subscribed and sworn to before me this 9th day of November 2001.

Cheryl D. Palmer, Notary Public

My Commission Expires Feb. 5, 2004

MARSHALLOY MQ (X-083.6)

SUMMARY

<table>
<tr><td>Revision</td><td>• We have expanded the explanation of the specifications.</td></tr>
<tr><td>Use</td><td>• Molds and tools</td></tr>
<tr><td>Product Characteristics</td><td>• Marshalloy MQ is imported under HTS number 7225.40.3050.

• Marshalloy Mold Quality in ASTM 4142 plate in dimensions of 65" x 145" and thicknesses ranging from 0.25" to 9.0", through-hard throughout the entire plate with a maximum dispersion of 30 BHN, conforming to ultrasonic testing requirements per ASTM A 578-S9 with a 2mm flat bottom hole used for calibration, microcleanliness ratings per ASTM E-45 method D where the sum of the ratings does not exceed 25 and the maximum worst field ratings are A: 1.0 max. (thin) and 0.5 max. (heavy), B: 1.0 max. (thin) and 0.5 max. (heavy), C: 0.5 max. (thin and heavy), D: 0.5 max. (thin and heavy); and plate flatness that does not exceed 0.120" in 40" with a maximum of 0.197 over the entire length of 145".

• In addition, this product possesses the following chemical composition: (percentages are by weight)
<table>
<tr><td>C</td><td>Mn</td><td>Si</td><td>S</td><td>P</td><td>Ni</td></tr>
<tr><td>0.36-0.42</td><td>1.10-1.30</td><td>0.35-0.45</td><td>0.012 – 0.02</td><td>0.030 max.</td><td>0.25–0.50</td></tr>
</table>
<table>
<tr><td>Cr</td><td>Mo</td><td>Cu</td><td>O_2</td><td>H_2</td></tr>
<tr><td>1.00-1.20</td><td>0.15-0.35</td><td>0.30 max.</td><td>20 ppm max.</td><td>2 ppm max.</td></tr>
</table></td></tr>
<tr><td>Total Quantity Imported in 2000</td><td>• Less than 2000 short tons</td></tr>
<tr><td>Is this product produced by U.S. mills?</td><td>• No. USS and BSC may be able to produce ASTM 4142 alloy plate, but, contrary to their claims, they are not able to meet the specifications required to make this plate mold quality, including that the product be warranted against metallurgical defects for up to 11 times the cost of the material.

• All other U.S. producers do not object to the exclusion of this product.</td></tr>
<tr><td>Will this product be used in place of other current imports?</td><td>• Because of its high price and unique applicability, this product is not competitively substituted for any other product.</td></tr>
</table>

Can this product be specifically identified for Customs purposes?	• This product is identifiable for Customs purposes by its trademark and its physical, mechanical, and chemical properties.

REVISED EXCLUSION REQUEST

(a) The designation of the product under a recognized standard or certification (e.g., ASTM, DIN), or the commercial name for the product and the HTS number under which this product enters the United States;

Marshalloy MQ is imported under HTS number 7225.40.3050

(b) A description of the product based on physical characteristics (e.g., chemical composition, metallurgical properties, dimensions, surface quality) so as to distinguish the product from products for which exclusion is not sought;

Marshalloy Mold Quality in ASTM 4142 plate in dimensions of 65" x 145" and thicknesses ranging from 0.25" to 9.0", through-hard throughout the entire plate with a maximum dispersion of 30 BHN, conforming to ultrasonic testing requirements per ASTM A 578-S9, with a 2mm flat bottom hole used for calibration, microcleanliness ratings per ASTM E-45 method D where the sum of the ratings does not exceed 25 and the maximum worst field ratings are A: 1.0 max. (thin) and 0.5 max. (heavy), B: 1.0 max. (thin) and 0.5 max. (heavy), C: 0.5 max. (thin and heavy), D: 0.5 max. (thin and heavy); and plate flatness that does not exceed 0.120" in 40" with a maximum of 0.197 over the entire length of 145". In addition, this product possesses the following chemical composition. (Numbers reflect percent by weight)

C	Mn	Si	S	P	Ni	Cr	Mo	Cu	O_2	H_2
0.36-0.42	1.10-1.30	0.35-0.45	0.012–0.20	0.030 max.	0.25–0.50	1.00-1.20	0.15-0.35	0.30 max.	20 ppm	2 ppm

(c) The basis for requesting an exclusion;

Usinor is the sole producer of this product. U.S. producers USS and BSC may be able to produce ASTM 4142 alloy plate, but, contrary to their claims, they are not able to meet the specifications required to make this plate mold quality including that the product be warranted against metallurgical defects for up to 11 times the cost of the material. All other U.S. producers do not object to the exclusion of this product.

(d) The names and locations of any producers, in the United States and foreign countries, of the product;

None.

(e) Total U.S. consumption of the product, if any, by quantity and value for each year, from 1996-2000, and projected annual consumption for each year from 2001-2005, with an explanation of the basis for the projection;

Response contains confidential information. *See* original submission, November 13, 2001.

(f) Total U.S. production of the Product for each year from 1996-2000, if any;

None.

(g) The identity of any U.S. produced substitute for the product, total U.S. production of the substitute for each year from 1996 to 2000, and the names of any U.S. producers of the substitute.

There are no substitutes for this product. The domestic industry has not identified any U.S.-produced substitute.

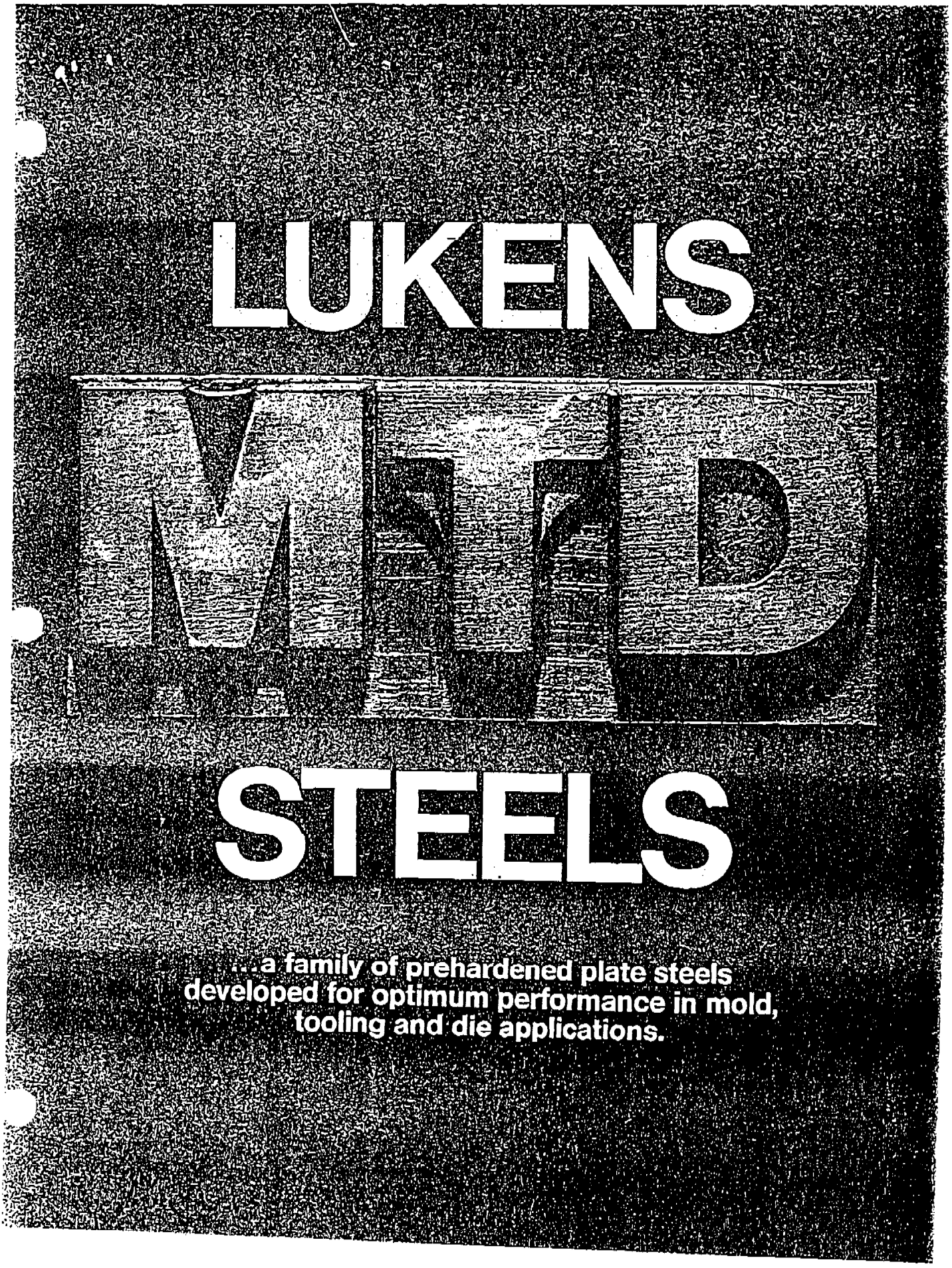
(h) Parties supporting this request.

Precision Marshall (*see* attached)

(i) Contact Person.

For any questions regarding this request, please contact:

Lisa Raisner
SHEARMAN & STERLING
801 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
Tel: 202-508-8049
Fax: 202-508-8100
E-mail: lraisner@shearman.com


LUKENS
MTD
STEELS
...a family of prehardened plate steels
developed for optimum performance in mold,
tooling and die applications.

Lukens MTD™ steels are a family of prehardened alloy plate steels developed primarily for mold, tooling and die applications. They possess the flexibility of the AISI 4100 steels, which are traditionally employed in a variety of end uses. In addition, MTD plates have been successfully saw cut into bar stock.

These steels are available in the 262-321 Brinell range* (unless otherwise noted) for optimum balance between machinability and hardness. The use of prehardened MTD steels eliminates the need to heat treat molds, holder blocks and other parts after machining. Heat treating machined components can result in cracking and distortion problems that require either repair or replacement.

Whether these steels are saw cut or flame cut, a final stress relief should be considered to enhance the dimensional stability of the material during machining.

Lukens MTD 1™ is a 4140 steel modified with slightly higher carbon and a vanadium addition. Vanadium improves grain refinement and, coupled with the higher carbon, promotes hardness and wear resistance. Another advantage of this steel is its excellent response to flame hardening for critical parts and sections.

In thicknesses to 3 inches inclusive, Lukens MTD 1 steel is normalized and tempered to 262-321 BHN range. In thicknesses over 3 inches to 6 inches inclusive, it is offered at 241-321 BHN.

CHEMICAL COMPOSITION

	Heat Analysis, %	Typical Analysis, %		Heat Analysis, %	Typical Analysis, %
Carbon	.38/.46	.44	Chromium	.80/1.15	.90
Manganese	.70/1.00	.85	Molybdenum	.15/.25	.17
Phosphorus	.035 max.	.018	Silicon	.15/.40	.28
Sulfur	.040 max.	.012	Vanadium	.03 min.	.05

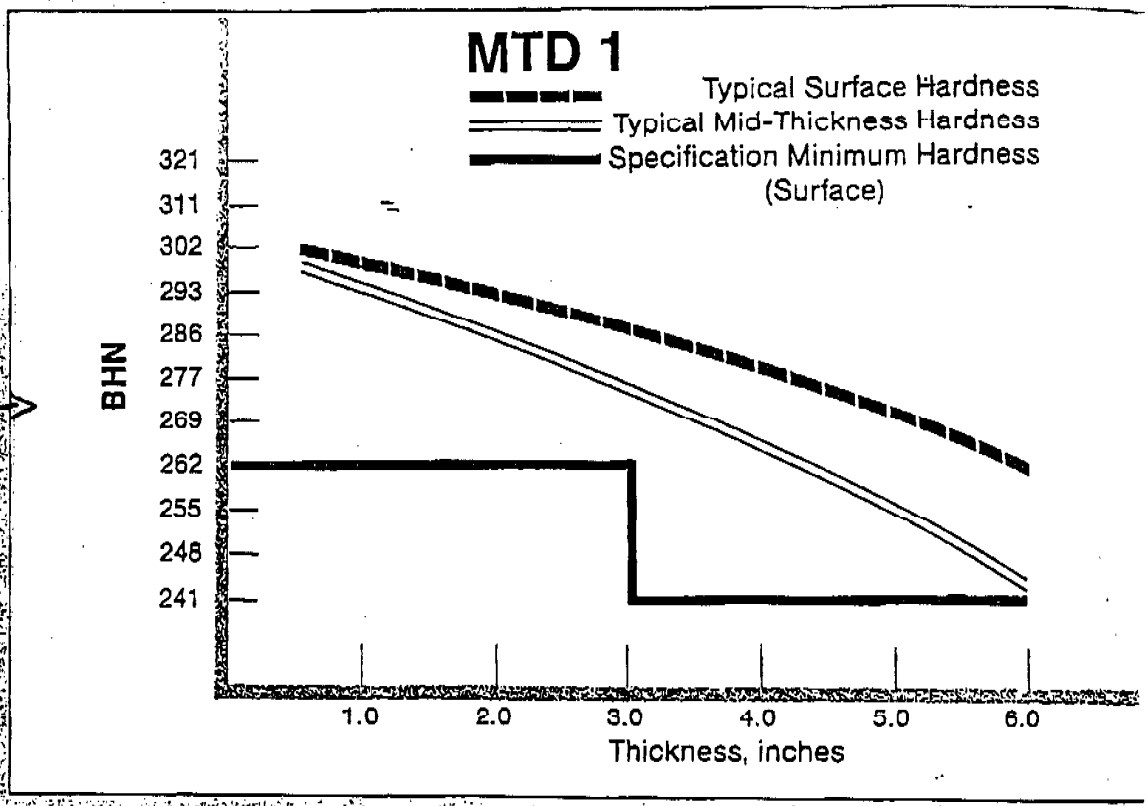
Lukens MTD 2™ is a holder block quality steel. It is also suitable for use in molds and other less sophisticated die applications. The nominal .29% carbon content of this steel permits water quenching to obtain a 262-321 BHN up to 10 inches inclusive. (Refer to Lukens for heavier thicknesses.) If it is flame cut, a stress relief should be considered to soften the hardened edges.

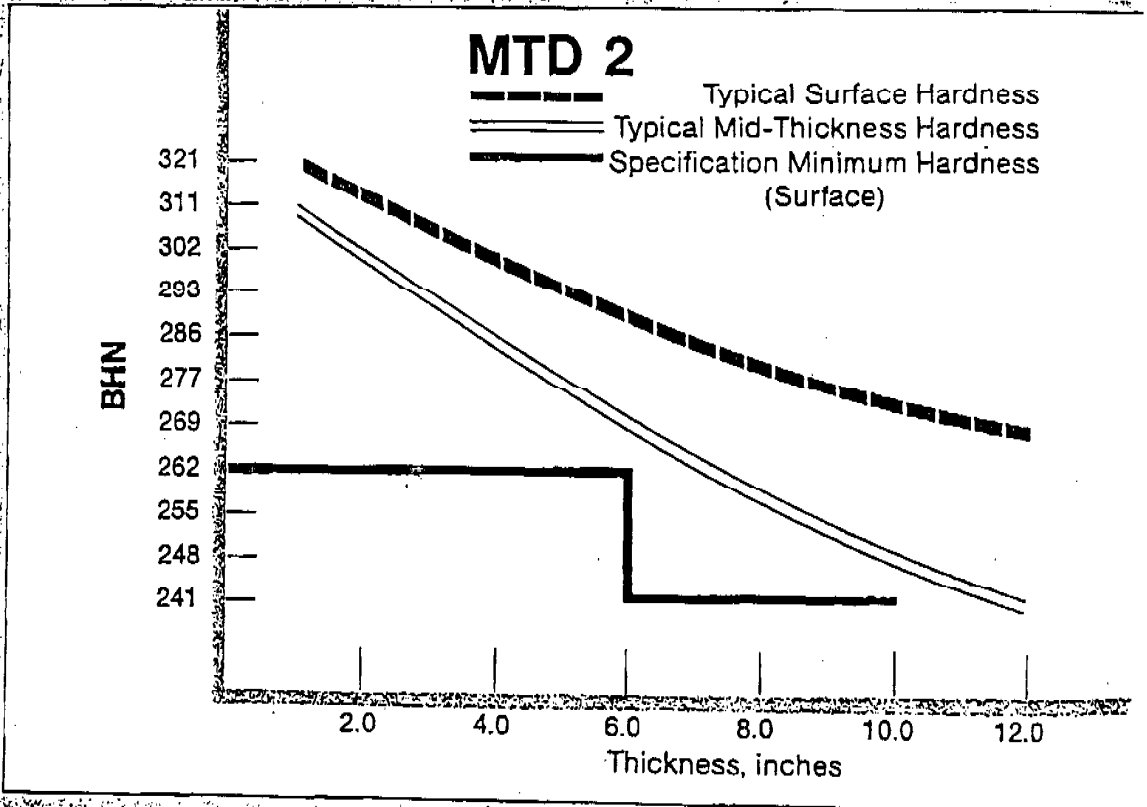
CHEMICAL COMPOSITION

	Heat Analysis, %	Typical Analysis, %		Heat Analysis, %	Typical Analysis, %
Carbon	.27/.33	.29	Chromium	.60/.90	.75
Manganese	.90/1.30	1.15	Molybdenum	.15/.25	.20
Phosphorus	.035 max.	.021	Silicon	.15/.40	.28
Sulfur	.040 max.	.014	Vanadium	.02 min.	.04

*BHN readings taken from standard test locations on surface after decarburization layer removed.

TYPICAL


MTD 1
Typical Surface Hardness
Typical Mid-Thickness Hardness
Specification Minimum Hardness
(Surface)
BHN
321
311
302
293
286
277
269
262
255
248
241
1.0
2.0
3.0
4.0
5.0
6.0
Thickness, inches


MTD 2
Typical Surface Hardness
Typical Mid-Thickness Hardness
Specification Minimum Hardness
(Surface)
BHN
321
311
302
293
286
277
269
262
255
248
241
2.0
4.0
6.0
8.0
10.0
12.0
Thickness, inches

CHAIRMAN KOPLAN: Thank you, Mr. Reilly.

MR. MILHOLLAN: Thank you, very much. My name is Jackson Milhollan. I'm the President and Chief Executive Officer of Precision Marshall Steel Company. We're headquartered in Washington, Pennsylvania. We're a privately-held independent firm. We were founded by my father in 1948. We have manufacturing operations near Pittsburgh and warehouse distribution operations around the country, including an operation in Chicago.

Now, I'm here to talk about our familiarity with the tool steel market, in terms of both imports and domestic activities and, hopefully, can clarify and shed some light on certain points.

In 1981 -- prior to 1981, our company had been closely associated with Bethlehem Steel, as a processor of their tool steel bar and, to some degree, plates. They decided to exit the business in that year and, at that time, we ended the industry in our own right, as a purchaser and seller of tool steel materials. Over a period of 20 years, we've been very familiar with all sources, both offshore and domestic, and I think I can speak authoritatively on them.

Over a period of time, the import producers have won Precision Marshall's business. Primary reasons they've won our business has been a more intense focus on quality. They provided more technical and marketing support. They have been more supportive in a wide variety of areas, in terms of customer training, and a lot of aspects to the business, to help us understand the products, to present them in the market to the greatest advantage. And they

have been, again -- actually executed partnership arrangements with us, in the best sense of the term.

Now, the domestic product is priced essentially the same or even lower than the products that we buy. On an apples-and-apples comparison of like products, we are actually paying a premium versus what would be an equivalent or nearly equivalent domestic product.

Now, the information in the pre-hearing brief to the industry, which has already been commented on by Mr. Reilly, again, I would just ask you to give this some consideration. If, in fact, the domestic industry was suffering from a true and real 50 percent disadvantage in prices, would they have in business at all? I think not.

Now, an actual fact over the period of the investigation, there has, in fact, been a certain degree of disruption in the domestic tool steel industry. Indeed, it's been caused by two major initiatives by the domestic producers, themselves.

One would be the entrance to the market, the tool steel plate market, by Universal Stainless and Alloy Products in Bridgeville, Pennsylvania. They came into the business in 1996. They added new capacity. They've become a significant player. The three existing players, at that time, both Bethlehem Lukens, Allegheny Ludlum, and Letourneau Steel in Texas, all continue to participate in the marketplace. An actual fact, domestic production has expanded on a voluntary basis, again, which has served to keep prices down and to intensify competition.

The second initiative undertaken by the American tool steel industry was Timken Latrobe's initiative in 1996, to integrate into -- vertically integrate into the distribution of tool steels, in addition to their mill activities. They made substantial investments and, in order to recoup those investments, they've attempted to grab market share. They've been a very significant factor in driving prices down over the period of investigation and, again, having an impact on the profitability of all players, both foreign and domestic.

In summary, I'd like to comment that I understand the domestic industry comes -- or came before you today with the full support of the United Steel Workers. I'd like to comment that our plant has United Steel Workers, too, and I'm here to stand up for their jobs, which are just as important to me and my company and to this nation, as the jobs in the domestic industry. Profitability is certainly an important item to everybody. And, again, I don't see that import relief is going to be required really to have a successful tool steel industry over the long term.

TPSC Meeting

January 11, 2002

Exclusion Request

- We are asking to exclude ***Marshalloy Mold Quality ™plate*** from any remedy imposed under Section 201.
- This is an easily distinguishable product.
- Usinor is the sole producer and supplier of this product which represents over 40% of our plate business. Last year this was less than 2000T which represents 1/30th of 1% of US plate shipments
- Accordingly, we do not understand the objection of the domestic industry to this requerst and their contention that they can make this product.
- U.S. producers may be able to produce 4142 alloy plate, but they are not able to perform the unique processing required to make this plate mold quality.
  - U.S. producers are not able to get the uniformity and through-hardness characteristics required of mold quality plate.
  - U.S. producers are not able to warranty their product, as required by our customers.
  - U.S. producers would have have to invest in additional equipment to produce mold quality plate.

Impact of Section 201 Trade Remedy

- The imposition of any restriction on imports of this product would have a significant impact on our company.
- Our specialized product is already very expensive (approximately $2,000 -$,3000 per short ton). Any additional tariffs imposed would make it impossible for us to sell and would force the closure of this very important part of our business.
- This would result in the direct loss of about 40 jobs at our Washington,PA operation.
- In addition, it would have a far greater impact down-stream on our customers and their customers, which range from small mold shops to large OEM's like Boeing, Ford and Husky. The result could well be that, rather than buying the steel and making the mold in the USA, they could simply buy the finished plastic molded part overseas.

SUPERPLAST® SP 300 (X-083.7)

SUMMARY

<table>
<tr><td>Revision</td><td>• We have expanded the explanation of our specifications.</td></tr>
<tr><td>Use</td><td>• Primarily used by the automotive industry in the production of large-dimension automotive components</td></tr>
<tr><td>Product Characteristics</td><td>• Superplast® SP 300 is imported under HTS number 7225.40.3050.
• Plastic mold steel plates, pre-forged and rolled blocks and forged extra-heavy section blocks with thickness of 6"-50", widths of 78.5", lengths of 120"-150", with the specification range of 6"-8" having a through-hardness of 269-300 Brinell (with a maximum dispersion of 15 bhn throughout the entire plate) and the range of 8"-50" having a through-hardness of 290-320 Brinnell (with a maximum dispersion of 30 bhn throughout the entire plate), conforming to ultrasonic testing requirements ASTM A578-S9 with a 2mm flat bottom hole, and homogenous product (free of hardspots) cleanliness guaranteed per ASTM E45 method A, worst field ratings A: 1.5 max., B: 1.5 max., C: 1.0 max., D: 1.5 max. This product must be through hard with a maximum dispersion of 15 bhn over 6"-8" thick and a maximum of 30 bhn over 8"-50" thick.
• In addition, this product contains the following patented chemical composition: (numbers represent percent by weight)
<table>
<tr><th>C</th><th>Cr</th><th>Mn</th><th>Ni</th><th>Mo</th><th>Si</th><th>B</th><th>S</th><th>O_2</th><th>H_2</th></tr>
<tr><td>0.235-0.265</td><td>1.20-1.40</td><td>1.20-1.40</td><td>0.30 max.</td><td>0.35-0.45</td><td>0.05-0.15</td><td>0.002-0.004</td><td>0.015 -0.02</td><td>20 ppm</td><td>2 ppm</td></tr>
</table>
</td></tr>
<tr><td>Total Quantity Imported in 2000</td><td>• 500 tons (2000 tons in 2001)</td></tr>
<tr><td>Is this product produced by U.S. mills?</td><td>• No. In spite of USS claims, no U.S. producer can produce this product to the above-listed specifications. All other domestic producers do not object to the exclusion of this product.</td></tr>
<tr><td>Will this product be used in place of other current imports?</td><td>• Because of its high price and unique applicability, this product is not competitively substituted for any other product.</td></tr>
<tr><td>Can this product be specifically identified for Customs purposes?</td><td>• This product is identifiable for Customs purposes by its trademark and by its physical, mechanical, and chemical properties.</td></tr>
</table>

REVISED EXCLUSION REQUEST

(a) The designation of the product under a recognized standard or certification (e.g., ASTM, DIN), or the commercial name for the product and the HTS number under which this product enters the United States;

Superplast® SP 300 is imported under HTS number 7225.40.3050.

(b) A description of the product based on physical characteristics (e.g., chemical composition, metallurgical properties, dimensions, surface quality) so as to distinguish the product from products for which exclusion is not sought;

Plastic mold steel plates, pre-forged and rolled blocks and forged extra-heavy section blocks with thickness of 6"-50", widths of 78.5", lengths of 120"-150", with the specification range of 6"-8" having a through-hardness of 269-300 Brinell (with a maximum dispersion of 15 bhn throughout the entire plate) and the range of 8"-50" having a through-hardness of 290-320 Brinell (with a maximum dispersion of 30 bhn throughout the entire plate), conforming to ultrasonic testing requirements ASTM A578-S9 with a 2mm flat bottom hole, and homogenous product cleanliness guaranteed per ASTM E45 method A with worst field ratings A: 1.5 max., B: 1.5 max., C: 1.0 max., D: 1.5 max. In addition, this product contains the following patented chemical composition: (numbers represent percent by weight)

C	Cr	Mn	Ni	Mo	Si	B	S	O_2	H_2
0.235-0.265	1.20-1.40	1.20-1.40	0.30 max.	0.35-0.45	0.05-0.15	0.0020-0.0040	0.015-0.02	20 ppm	2 ppm

(c) The basis for requesting an exclusion;

Usinor is the sole producer of this product. No U.S. producer can make this product to the specifications required for all mold-quality steel. Specifically we do not agree with the USS claim that it can manufacture this product and furthermore USS does not even possess facilities that can produce such large dimensions. We believe that USS is not able to control the boron metallurgy to ensure hardness homogeneity. All other domestic producers do not object to the exclusion of this product.

(d) The names and locations of any producers, in the United States and foreign countries, of the product;

None.

(e) Total U.S. consumption of the product, if any, by quantity and value for each year, from 1996-2000, and projected annual consumption for each year from 2001-2005, with an explanation of the basis for the projection;

Response contains confidential information. *See* original submission, November 13, 2001.

(f) Total U.S. production of the Product for each year from 1996-2000, if any;

None.

(g) The identity of any U.S. produced substitute for the product, total U.S. production of the substitute for each year from 1996 to 2000, and the names of any U.S. producers of the substitute.

There are no substitutes for this product. The domestic industry has not identified any U.S.-produced substitute.

(h) Parties supporting this request.

Precision Marshall (*see* attached)

Burger Iron Company (*see* attached)

(i) Contact Person.

For any questions regarding this request, please contact:

Lisa Raisner
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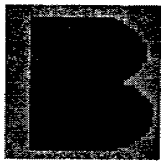
801 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
Tel: 202-508-8049
Fax: 202-508-8100
E-mail: lraisner@shearman.com



The Burger Iron Company

TPSC Meeting

January 11, 2002

Overview of The Burger Iron Company

- The Burger Iron Company is a distributor and processor of carbon and alloy plate products and heavy forged blocks, and a supplier of mold steel to mold makers.
- Two thirds of the steel we purchase is produced in the United States.
- We have 220 employees, 100 of which are U.S. steelworkers, and supply many types of customers, primarily automotive.
- Based on the growth potential in the mold-making business, we have recently made a $6 million dollar investment in a facility in Grand Rapids, MI, designed especially to process heavy blocks of plastic-mold steel.
- Our objective is fight an increasing trend where the tooling industry is moving offshore. Through our investment in this new facility, and our work with Usinor to develop a product that brings value to the entire customer chain, we hope to make sure more tools are built in this country.

Exclusion Request

- We are asking to exclude ***Superplast SP300*** from any remedy imposed under Section 201. It is identifiable for Customs purposes by its trademark and chemical analysis.
- This product is a highly specialized and patented product used to make molds for plastic parts -- from electrical connectors to truck beds -- for toys, appliances and autos.
  - It is purchased in heavy blocks that we process in our Grand Rapids facility and sell to mold makers.
- Usinor is the sole producer and supplier of Superplast SP300, a superior product that enables the production of molds with no imperfections, a significant benefit to U.S. mold makers.
- We have gone to great lengths to work with U.S. steel producers to obtain a domestic supply.
  - U.S. producers have been either unwilling or unable to produce the steel to the specifications required for mold-quality steel.
  - We took Usinor only as a last resort when we were turned down by the U.S producers, and have been developing this particular product with them for over 10 years.
- This product represents less than .05 percent of total domestic plate production and .3 percent of total plate imports.
- Because of its high price and unique mold applicability, SP300 is not competitively substituted for any other product.

Impact of Section 201 Trade Remedy

- The imposition of any restriction, elimination, or significant price increase on this product would have a significant impact on our company.
    - This product is already high-priced; the market will not tolerate a price increase.
    - Our Grand Rapids facility is an integral part of our business. Imposing a remedy on this product would put 220 jobs at risk.
- In addition, there are 72,000 U.S. mold makers whose jobs depend on their competiliveness. Our product helps make them competitive. Furthermore, the plastic-molding industry is significantly larger and would be eliminated if companies like Ford, Rubbermaid and Hoover continue moving their plastic mold-making and molding operations offshore.

SINCE 1898

The Burger Iron Company

Post Office Box 2219 • 1324 Firestone Parkway
Akron, Ohio 44309-2219 Akron, Ohio 44301-1692
Phone (330) 253-5121 • Fax (330) 253-4539

February 12, 2002

Congressman Tom Sawyer
House of Representatives
411 Wolf Ledges Parkway, Ste. 105
Akron OH 44311

Dear Congressman Sawyer:

We are writing about a serious issue that could have a dramatic impact on the livelihoods of employees working within your Congressional District. Our company, BICO Akron, Inc., a subsidiary of The Burger Iron Company, is a steel service center processing heavy steel plate for tooling applications primarily for the automotive industry, but for other industries as well. It is headquartered in Mogadore, Ohio and has gross revenues that exceed ten million dollars. We employ 215 people throughout North America, with 158 of them located in the Akron area. We contribute to the economy in Ohio in your District, both through direct employment and by sourcing components locally, wherever possible.

As you may know, the Bush Administration is currently considering remedy options in the ongoing investigation of certain imported steel products under Section 201. The possibility that the President will impose significant import restrictions in this case threatens the continued viability and long-term competitiveness of our company. It is therefore imperative that the President understands that many small to medium size companies, like us, cannot obtain the necessary steel from the domestic steel companies. This steel is the lifeblood of our company. If you remove this steel from the U. S. markets, you will remove our livelihoods.

We need your assistance in our effort to persuade the Bush Administration to exempt SP300, a steel we purchase from France, from the scope of any remedies recommended in this case. We understand that the domestic steel industry requires some form of assistance, however, that assistance should not come at the expense of industrious companies that depend upon and benefit from imported steel. It is imperative that we, and companies like us, have unrestricted access to this material. Usinor Industeel is our only source of supply for this product and produces it to a higher quality than is available domestically. It is a more expensive product to our customer base and certainly not one that qualifies for a "dumping" classification. We have invested heavily in equipment and inventories and, should tariffs be imposed to the magnitude being discussed, we will become uncompetitive in the

markets we serve. The loss of jobs and loss of business would severely threaten the viability of our firm as a whole. As you can see, the potential personal, social and economic losses that are likely to result from import restrictions will have a severe impact on many of your constituents. We need your help.

We will contact your office in the near future to seek a meeting on this issue, and would appreciate anything you can do to help address this matter with the Bush Administration.

Very truly yours,

THE BURGER IRON COMPANY

Tom Fiocca

T. M. Fiocca
President and C. E. O.

TMF/s

SINCE 1896

The Burger Iron Company

Post Office Box 2219 • 1324 Firestone Parkway
Akron, Ohio 44309-2219 Akron, Ohio 44301-1692
Phone (330) 253-5121 • Fax (330) 253-4539

February 12, 2002

Congressman Tony P. Hall
House of Representatives
501 Federal Building
200 West 2nd Street
Dayton OH 454402

Dear Congressman Hall:

We are writing about a serious issue that could have a dramatic impact on the livelihoods of employees working within your Congressional District. Our company, BICO Dayton, Inc., a subsidiary of The Burger Iron Company, is a steel service center processing heavy steel plate for tooling applications primarily for the automotive industry, but for other industries as well. It is headquartered in Dayton, Ohio and has gross revenues that exceed five million dollars. We employ 215 people throughout North America, with 13 of them located in Dayton. We contribute to the economy in Ohio in your District, both through direct employment and by sourcing components locally, wherever possible.

As you may know, the Bush Administration is currently considering remedy options in the ongoing investigation of certain imported steel products under Section 201. The possibility that the President will impose significant import restrictions in this case threatens the continued viability and long-term competitiveness of our company. It is therefore imperative that the President understands that many small to medium size companies, like us, cannot obtain the necessary steel from the domestic steel companies. This steel is the lifeblood of our company. If you remove this steel from the U. S. markets, you will remove our livelihoods.

We need your assistance in our effort to persuade the Bush Administration to exempt SP300, a steel we purchase from France, from the scope of any remedies recommended in this case. We understand that the domestic steel industry requires some form of assistance, however, that assistance should not come at the expense of industrious companies that depend upon and benefit from imported steel. It is imperative that we, and companies like us, have unrestricted access to this material. Usinor Industeel is our only source of supply for this product and produces it to a higher quality than is available domestically. It is a more expensive product to our customer base and certainly not one that qualifies for a "dumping" classification. We have invested heavily in equipment and inventories and, should tariffs be

imposed to the magnitude being discussed, we will become uncompetitive in the markets we serve. The loss of jobs and loss of business would severely threaten the viability of our firm as a whole. As you can see, the potential personal, social and economic losses that are likely to result from import restrictions will have a severe impact on many of your constituents. We need your help.

We will contact your office in the near future to seek a meeting on this issue, and would appreciate anything you can do to help address this matter with the Bush Administration.

Very truly yours,

THE BURGER IRON COMPANY

T. M. Fiocca
President and C. E. O.

TMF/s

SINCE 1896

The Burger Iron Company

Post Office Box 2219 • 1324 Firestone Parkway
Akron, Ohio 44309-2219 Akron, Ohio 44301-1692
Phone (330) 253-5121 • Fax (330) 253-4539

February 12, 2002

Congressman James Demint
House of Representatives
201 Magnolia St., Ste. 108
Spartanburg SC 29301

Dear Congressman Demint:

We are writing about a serious issue that could have a dramatic impact on the livelihoods of employees working within your Congressional District. Our company, BICO South, Inc., a subsidiary of The Burger Iron Company, is a steel service center processing heavy steel plate for tooling applications primarily for the automotive industry, but for other industries as well. It is headquartered in Spartanburg, South Carolina and has gross revenues that exceed four million dollars. We employ 215 people throughout North America, with 14 of them located in Spartanburg. We contribute to the economy in South Carolina in your District, both through direct employment and by sourcing components locally, wherever possible.

As you may know, the Bush Administration is currently considering remedy options in the ongoing investigation of certain imported steel products under Section 201. The possibility that the President will impose significant import restrictions in this case threatens the continued viability and long-term competitiveness of our company. It is therefore imperative that the President understands that many small to medium size companies, like us, cannot obtain the necessary steel from the domestic steel companies. This steel is the lifeblood of our company. If you remove this steel from the U. S. markets, you will remove our livelihoods.

We need your assistance in our effort to persuade the Bush Administration to exempt SP300, a steel we purchase from France, from the scope of any remedies recommended in this case. We understand that the domestic steel industry requires some form of assistance, however, that assistance should not come at the expense of industrious companies that depend upon and benefit from imported steel. It is imperative that we, and companies like us, have unrestricted access to this material. Usinor Industeel is our only source of supply for this product and produces it to a higher quality than is available domestically. It is a more expensive product to our customer base and certainly not one that qualifies for a "dumping" classification. We have invested heavily in equipment and inventories and, should tariffs be imposed to the magnitude being discussed, we will become uncompetitive in the

markets we serve. The loss of jobs and loss of business would severely threaten the viability of our firm as a whole. As you can see, the potential personal, social and economic losses that are likely to result from import restrictions will have a severe impact on many of your constituents. We need your help.

We will contact your office in the near future to seek a meeting on this issue, and would appreciate anything you can do to help address this matter with the Bush Administration.

Very truly yours,

THE BURGER IRON COMPANY

Tom Fiocca

T. M. Fiocca
President and C. E. O.

TMF/s

SINCE 1896

The Burger Iron Company

Post Office Box 2219
Akron, Ohio 44309-2218

1324 Firestone Parkway
Akron, Ohio 44301-1692

Phone (330) 253-5121 • Fax (330) 253-4539

February 12, 2002

Congressman Vernon Ehlers
House of Representatives
110 Michigan St.
Grand Rapids MI 49503-2313

Dear Congressman Ehlers:

We are writing about a serious issue that could have a dramatic impact on the livelihood of employees working within your Congressional District. Our company, BICO Michigan, Inc., a subsidiary of The Burger Iron Company, is a steel service center processing heavy steel plate for tooling applications primarily for the automotive industry, but for other industries as well. It is headquartered in Grand Rapids, Michigan and has gross revenues that exceed eight million dollars. We employ 215 people throughout North America, with 27 of them located in Grand Rapids. We contribute to the economy in Michigan in your District, both through direct employment and by sourcing components locally, wherever possible.

As you may know, the Bush Administration is currently considering remedy options in the ongoing investigation of certain imported steel products under Section 201. The possibility that the President will impose significant import restrictions in this case threatens the continued viability and long-term competitiveness of our company. It is therefore imperative that the President understands that many small to medium size companies, like us, cannot obtain the necessary steel from the domestic steel companies. This steel is the lifeblood of our company. If you remove this steel from the U. S. markets, you will remove our livelihoods.

We need your assistance in our effort to persuade the Bush Administration to exempt SP300, a steel we purchase from France, from the scope of any remedies recommended in this case. We understand that the domestic steel industry requires some form of assistance, however, that assistance should not come at the expense of industrious companies that depend upon and benefit from imported steel. It is imperative that we, and companies like us, have unrestricted access to this material. Usinor Industeel is our only source of supply for this product and produces it to a higher quality than is available domestically. It is a more expensive product to our customer base and certainly not one that qualifies for a "dumping" classification. We have invested heavily in equipment and inventories and, should tariffs be imposed to the magnitude being discussed, we will become uncompetitive in the

markets we serve. The loss of jobs and loss of business would severely threaten the viability of our firm as a whole. As you can see, the potential personal, social and economic losses that are likely to result from import restrictions will have a severe impact on many of your constituents. We need your help.

We will contact your office in the near future to seek a meeting on this issue, and would appreciate anything you can do to help address this matter with the Bush Administration.

Very truly yours,

THE BURGER IRON COMPANY

T. M. Fiocca
President and C. E. O.

TMF/s